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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON**

**LAURA HANSON,**

Plaintiff,

v.

**STATE OF OREGON LEGISLATIVE  
ASSEMBLY,**

Defendant.

Case No. 3:21-CV-00780-SI

**PLAINTIFF'S ITEMIZED LIST OF  
SPECIAL DAMAGES**

**INTRODUCTION**

Plaintiff Laura Hanson alleges violations of the Americans with Disabilities Act, 42 U.S.C. § 12111, *et seq.*; Rehabilitation Act, 29 U.S.C. § 701, *et seq.*; ORS 659A.112; ORS 659A.183; ORS 659A.199; and ORS 659A.203.

## **DAMAGES**

**Wage Loss.** Plaintiff seeks relief in the form of back pay/wage loss. Plaintiff will testify regarding her back pay. She made \$4,727 per month while she was assigned to work in Sen. Gelser's office, which is reflected in defendant's hiring records. Defendant terminated her on October 7, 2020. She obtained new, limited-duration employment from December 17, 2020, through August 31, 2021, which is reflected in her WorkDay records. Defendant then re-hired her, and she worked from January 3, 2023, through January 25, 2025, at a rate of \$5,627 per month, which is reflected in an email from Rep. Pham to plaintiff. Plaintiff started law school in early August 2023.

In total, we estimate plaintiff's wage loss in the form of back pay to be \$116,866.

**Medical Expenses.** Ms. Hanson will testify that saw a therapist during her tenure with Sen. Gelser and through July 2021. Between January 6, 2020, when defendant suspended her, and July 2021, she had 42 therapy visits, and each visit cost \$160, which is supported by records from Ms. Hanson's therapist.

In total, we estimate plaintiff's therapy expenses to be \$6,720.

**Compensatory Damages.** In addition to plaintiff's wage loss and medical expenses, she experienced humiliation, depression, anxiety, exacerbation of her PTSD and ADHD, suicidal ideation, and other emotional harms as a result of defendant's actions.

**Other Damages.** Plaintiff has also asked for attorney fees and reasonable costs, pre- and post-judgment interest, and prevailing party costs.

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Dated this 11th day of April, 2024.

Respectfully submitted,

/s/ Rebecca Cambreleng  
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## CERTIFICATE OF SERVICE

I certify that on April 11, 2024, I served the foregoing **PLAINTIFF'S ITEMIZED LIST OF SPECIAL DAMAGES** upon the parties hereto via electronic means through the Court's Case Management/Electronic Case File system and via electronic mail:

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